

I would like to respectively comment on two aspects of the ARRL petition of which are indicated in paragraph 13 and further in paragraph 20 of RM-10867.

Streamline the licensing process

Removal of the legacy licenses in itself could be the catalyst for streamlining the licensing process if its initiation is done in a manner conducive with the current electronic filing system (EFS). Conversions of the legacy licensees could be performed during the time when a licensee performs an administrative change to their license such as renewal or name or address change within the EFS. Commission instigated conversions could also take place during license upgrade or other activity associated with Form 605. This would reduce the expense involved by the Commission and could be a rather transparent process. I agree with those comments indicated in paragraph 20 of the ARRL petition and believe that therein lays a valid solution pertaining to the administrative tasks required by the Commission.

Advancement of the radio art

The radio art consist of many aspects some of which are technical in nature and others that are skill based and I would like to comment on the Morse code requirement which many consider a skill based aspect.

The Morse code skill requirement is a very emotional topic among the amateur radio population as noted in many of the other posts pertaining to the issue at hand. Dealing with this issue places the Commission in a position whereas they are making decisions that affect the culture of the radio art. Since it is within the hands of the Commission to determine whether or not the Morse requirement is necessary, please consider that the Morse code requirement is a part of the learned behavior of what an amateur radio operator should know among the population of radio amateurs. It is a distinctive, learned technique of this population of people and should be preserved in some form whether it is maintained as a licensing requirement is up to the judgment of the Commission. Culture should be preserved because the act of cultural preservation has been shown in other instances to be very important to our society. The ARRL's petition allows preservation of this skill.